

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, et al.,  
individually and on behalf  
of others similarly situated,      No.  
                                 Plaintiffs,      3:18-cv-01477-JR  
                                 v.  
NIKE INC., an Oregon  
Corporation,  
                                 Defendant.

REMOTE VIDEOCONFERENCE DEPOSITION OF  
MONIQUE MATHESON  
Taken in behalf of Plaintiffs  
February 22, 2021

1 BE IT REMEMBERED THAT, the remote  
2 videoconference deposition of MONIQUE MATHESON  
3 was reported by Aleshia K. Macom, Oregon CSR  
4 No. 94-0296, Washington CCR No. 2095, California  
5 CSR No. 7955, RMR, CRR, RPR, on Monday,  
6 February 22, 2021, commencing at the hour of  
7 9:02 a.m., the witness appearing at Beaverton,  
8 Oregon.

9  
10 APPEARANCES (Via Zoom videoconference)

11  
12 GOLDSTEIN, BORGAN, DARDARIAN & HO

13 By Barry Goldstein

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24 Appearing for Plaintiffs

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7 Appearing for Defendant

8  
9 Also Present: Felicia Davis - Nike

10 Lauren Thibodeaux - Nike

11 \* \* \*

1 not Nike received a complaint that Mr. Ayre had  
2 created a hostile work environment.

3 MR. PRINCE: Same objection.

4 THE WITNESS: I don't know.

5 Q. BY MR. BARRY GOLDSTEIN: You don't know one way  
6 or the other whether Nike had received a  
7 complaint that Mr. Ayre was creating a hostile  
8 work environment?

9 MR. PRINCE: Asked and answered.

10 THE WITNESS: I'm not aware whether Nike  
11 received a complaint regarding Mr. Ayre and a  
12 hostile work environment.

13 Q. BY MR. BARRY GOLDSTEIN: Who at Nike would know  
14 whether Nike had received a complaint that  
15 Mr. Ayre had created a hostile work environment?

16 A. I'm not sure who would know that.

17 Q. I'm going to read another couple sentences from  
18 this article from the same page. "In July  
19 Mr. Parker held an annual leadership team  
20 meeting at a resort in Oregon's Willamette  
21 Valley where he informed Mr. Ayre he could no  
22 longer stay, one person said. The next day Nike  
23 announced Mr. Ayre's retirement and the  
24 promotion of Monique Matheson."

25 Do you see those sentences?

1     A.     I do see those sentences.

2     Q.     Was your promotion announced on the same day as  
3            the announcement of Mr. Ayre's retirement?

4     A.     I don't recall the exact announcement of either  
5            his departure or my promotion.

6     Q.     We're uploading a document that is marked as  
7            Exhibit 631 from Nike News, dated July 18, 2017,  
8            heading, "Nike, Inc., announces Monique Matheson  
9            as New EVP Global Human Resources." Let me know  
10           when you've downloaded Exhibit 631, please.

11    A.     I have that document open.

12    Q.     Can you identify this document, please?

13    A.     It's, I mean, it's, it's entitled "Nike News."  
14           I don't, I don't understand the question.

15    Q.     What is Nike News?

16    A.     I, I don't know. I don't know. I don't know  
17            where this came from.

18    Q.     Does Nike make announcements in documents  
19            referred to as Nike News?

20    A.     I'm not sure.

21    Q.     As you see down at the bottom, it came from the  
22            internet.

23            Is this a document that would have been  
24            posted to Nike's website?

25            MR. PRINCE: Objection; speculation.

1           THE WITNESS: I haven't seen this document.  
2           I'm not sure where it came from.

3    Q.    BY MR. BARRY GOLDSTEIN: Does it refresh your  
4           recollection that you're, you were announced as  
5           the new EVP on July 18, 2017?

6    A.    I don't recall the specific date. And this date  
7           is, is in the, is in the ballpark of when I  
8           would have been announced.

9    Q.    Do you know if the announcement of your  
10           appointment as the new EVP was made on the same  
11           day that Mr. Ayre's retirement was announced?

12           MR. PRINCE: Asked and answered.

13           THE WITNESS: I don't recall specifically,  
14           although it makes sense that I would not be  
15           announced into a job unless it had already been  
16           announced that David was not in the job.

17    Q.    BY MR. BARRY GOLDSTEIN: By "David" you're  
18           referring to David Ayre?

19    A.    I'm referring to David Ayre.

20    Q.    Do you know if Mr. Parker informed Mr. Ayre at  
21           the 2017 leadership conference in the Willamette  
22           Valley that he had to leave the conference?

23           MR. PRINCE: Objection; vague, speculation.

24           THE WITNESS: I don't know what  
25           conversations occurred between Mr. Parker and

1 MR. BYRON GOLDSTEIN: Ms. Matheson, we can  
2 either do it for you or you can right click on  
3 the screen and then do you see where it says  
4 rotate clockwise?

5 THE WITNESS: Yes.

6 MR. BYRON GOLDSTEIN: So whichever you  
7 prefer. It's just how the court reporter saved  
8 them last time. But we're happy to do it on our  
9 end if you prefer.

10 THE WITNESS: I've got it. Just take a  
11 second.

12 I believe that I would have seen -- Well,  
13 let me back up. When the survey --

14 Q. BY MR. BARRY GOLDSTEIN: Pardon?

15 A. When the survey is provided to Nike, I did a  
16 initial review of the surveys. I don't recall  
17 all the pages or the contents of the surveys.  
18 So the format looks familiar, but I don't recall  
19 if I saw all of these pages when I did that  
20 review.

21 Q. Let me ask you about the format. Do you recall  
22 that the format of the survey was at the first  
23 page, was the same for the survey and it's the  
24 first page of Exhibit 587, which is  
25 NIKE\_00033338? Do you recall that this being

1        the first page for the survey responses that you  
2        saw?

3        A.    My recollection is that this was the first page  
4        of most of the surveys.

5        Q.    And it had two general areas, discrimination or  
6        other harassment and sexual harassment; is that  
7        correct?

8        A.    I -- This first page has those two, those two  
9        areas. So I believe this page was the first  
10       page of the survey.

11       Q.    Okay. Now, some of the survey responses were  
12       anonymous. This one was not. It's listed as  
13       [REDACTED]. Do you know [REDACTED]?

14       A.    I do.

15       Q.    How do you know [REDACTED]

16       A.    She was a Nike employee.

17       Q.    What was her position?

18       A.    She held a number of positions at Nike. I  
19       believe her most recent position was the GM of  
20       New York City.

21       Q.    And that's a vice president level position, is  
22       it not?

23       A.    She was a vice president.

24       Q.    Is [REDACTED] still with Nike?

25       A.    [REDACTED] is no longer an employee at Nike.



1 concerns of an employee, to take notes of any  
2 interview you had with an employee?

3 A. It is my general practice to take notes when I'm  
4 talking to employees who've brought a concern  
5 forward.

6 MR. BARRY GOLDSTEIN: Why don't we take a  
7 ten-minute -- You'd like to take a recess now?

8 THE WITNESS: Yes, please.

9 MR. BARRY GOLDSTEIN: Okay. So it's noon.  
10 12:10? Is ten minutes enough time,  
11 Ms. Matheson?

12 THE WITNESS: I think it's okay.

13 MR. BARRY GOLDSTEIN: Okay. 12:10.

14 (Break taken from 11:59 to 12:15.)

15 Q. BY MR. BARRY GOLDSTEIN: Ms. Matheson, did you  
16 write up a summary or a report of your  
17 conversation with [REDACTED] regarding the  
18 concerns that she raised in the survey document?

19 MR. PRINCE: Asked and answered.

20 THE WITNESS: I don't have a specific  
21 recollection of writing up notes from my meeting  
22 with [REDACTED]. But as I stated earlier, it  
23 would have been my practice to write notes.

24 Q. BY MR. BARRY GOLDSTEIN: You did give that  
25 testimony about notes, but I asked about a

1 THE WITNESS: Could you repeat that  
2 question?

3 MR. BARRY GOLDSTEIN: Aleshia, please.

4 (Record read as follows:

5 "Q Would there be a record of the  
6 conclusions reached with respect to the  
7 investigation of [REDACTED] complaint?")

8 THE WITNESS: There was an investigation  
9 into every concern that was brought forward,  
10 including [REDACTED]. I believe there would  
11 be a report associated with the investigation.  
12 I don't recall seeing it.

13 Q. BY MR. BARRY GOLDSTEIN: Did you recall -- Do  
14 you -- Have you seen the investigation report  
15 with respect to any of the complaints that were  
16 filed in the Starfish survey?

17 MR. PRINCE: Vague as well as foundation.

18 THE WITNESS: As I said earlier, every  
19 concern that was raised was followed up on. I'm  
20 not sure the status of the reports. I recall  
21 seeing some reports. I do not recall which  
22 specific reports I reviewed.

23 Q. BY MR. BARRY GOLDSTEIN: Do you recall, were  
24 there conclusions with respect to the validity  
25 of the complaints made in the survey included in

1 the reports that you saw?

2 MR. PRINCE: Same objection.

3 THE WITNESS: The reports, I don't recall  
4 the specific reports. The reports would have  
5 provided an overview of what the investigation  
6 found as part of a followup.

7 Q. BY MR. BARRY GOLDSTEIN: Where are those reports  
8 retained?

9 A. I don't know where they're retained.

10 Q. Do you know if the reports related to the  
11 complaints made in the Starfish survey have been  
12 retained by Nike?

13 A. All of the concerns, all of the employee  
14 concerns that were brought forward in a  
15 followup. And our outside counsel took the full  
16 set of surveys and ensured that everyone had a  
17 followup. I don't know where the reports are  
18 kept right now. I do believe that Nike would  
19 have maintained a copy of the reports. I don't  
20 know where they are or who has them.

21 Q. You testified that it was your usual practice to  
22 take notes with respect to conversations that  
23 you had with employees who raised concerns.  
24 Where would the notes that you would take of  
25 those interviews be retained?

1 would have been shared for the relevant followup  
2 investigation.

3 Q. When you interviewed vice president [REDACTED], was  
4 there anyone else on that conversation that you  
5 had with [REDACTED]?

6 A. Yes.

7 Q. Is it a telephone conversation?

8 A. I believe it was an in-person conversation.

9 Q. Where did that in-person conversation take  
10 place?

11 A. I believe it happened, I believe it occurred in  
12 a conference room on the first floor of the Dan  
13 Fouts or the Salazar building, one of the --

14 Q. This is at Nike World -- Excuse me. This is at  
15 Nike World Headquarters?

16 A. Yes. In a conference room in one of the Nike  
17 buildings here on campus.

18 Q. Who else was present when you had this in-person  
19 conversation with [REDACTED]?

20 A. Our chief administrative officer, Hilary Krane.

21 Q. Did you talk to other employees who responded to  
22 the Starfish survey about their complaints?

23 A. I spoke with a number of employees who brought  
24 concerns forward. Not all of whom completed a  
25 survey.

1 survey.

2 Q. Was your conversation with [REDACTED] in person?

3 A. Yes.

4 Q. Was it -- Excuse me.

5 A. Yes. I had an in-person conversation with [REDACTED]

6 [REDACTED].

7 Q. Is [REDACTED] still employed at Nike?

8 A. She is no longer a Nike employee.

9 Q. What was [REDACTED] last position at Nike?

10 A. I don't recall her title.

11 Q. Was she a vice president?

12 A. She was.

13 Q. Was anyone else present when you met with [REDACTED]

14 [REDACTED]?

15 A. Yes.

16 Q. Who was present?

17 A. Hilary Krane, I believe.

18 Q. Did you take notes of your meeting with [REDACTED]

19 [REDACTED]?

20 A. Yes. I believe I would have taken notes at the  
21 advice of counsel and consistent with my  
22 practice. I very likely took notes during that  
23 conversation.

24 Q. Would your notes reflect whether or not Hilary  
25 Krane was present?

1 Q. Did you take notes during that meeting?

2 A. I don't have specific recollection of taking  
3 notes. And it would have been my practice to  
4 take notes, and likely on the advice of counsel,  
5 I would have taken notes.

6 Q. You also met with [REDACTED], and I'm sorry I don't  
7 have her last name. But you know who I'm  
8 referring to?

9 A. I believe you're referring to [REDACTED].

10 Q. Right. Did you meet with her in person?

11 A. I did.

12 Q. Was Ms. Krane present at that meeting as well?

13 A. I don't recall if Hilary was present for that  
14 meeting.

15 Q. Do you recall if anybody else was present at  
16 that meeting?

17 A. No one else would have been present in that  
18 meeting.

19 Q. Is, is [REDACTED] still an employee with the  
20 company?

21 A. [REDACTED] is not an employee of Nike.

22 Q. What was her position at the time that she made  
23 a complaint with the Starfish survey?

24 A. I believe [REDACTED] was a vice president in our  
25 design organization.

1 MR. BARRY GOLDSTEIN: Why don't we take a  
2 lunch period.

3 (Break taken from 12:57 to 1:47.)

4 Q. BY MR. BARRY GOLDSTEIN: Okay. We've uploaded  
5 an exhibit marked as 506, Uniform Guidelines on  
6 Employee Selection Procedures. Ms. Matheson,  
7 let me know when you have this document up,  
8 please.

9 A. Okay. I have the Code of Federal Regulations  
10 up. Hang on one minute. I'm not able to --  
11 Okay.

12 Q. If you look down it says "Part 1607, Uniform  
13 Guidelines and Employee Selection Procedures."  
14 Are you familiar with the uniform guidelines?

15 A. I am not.

16 Q. I'll just ask you a couple of questions with  
17 respect to these guidelines. I'm going to ask  
18 you a question on page 19 of the guidelines.  
19 It's section 1607.16X. And I will read that,  
20 Ms. Matheson.

21 A. Give me a minute.

22 Q. Do you have it?

23 A. I'm not quite there. Page 17, you said?

24 Q. 19.

25 A. Okay. I'm on page 19.

1 Q. And I want to read to you section X.

2 A. Okay.

3 Q. "Validated in accordance with these guidelines  
4 or properly validated. A demonstration that one  
5 or more validity study or studies meeting the  
6 standards of these guidelines has been  
7 conducted, including investigation and, where  
8 appropriate, use of suitable alternative  
9 selection procedures as contemplated by section  
10 3B and has produced evidence of validity  
11 sufficient to warrant use of the procedure for  
12 the intended purpose under the standards of  
13 these guidelines."

14 My question, Ms. Matheson, is do you know if  
15 any validity study has been conducted by Nike  
16 with respect to promotion practices?

17 MR. PRINCE: Vague and ambiguous.

18 THE WITNESS: I'm not sure whether any  
19 validation studies have been completed.

20 Q. BY MR. BARRY GOLDSTEIN: Do you know of any such  
21 validity studies as defined by what I just read  
22 from the uniform guidelines?

23 A. I'm not aware.

24 MR. PRINCE: Vague. Hang on. Vague and  
25 also to the extent it would call for an expert



1 opinion or a legal conclusion.

2 THE WITNESS: I'm not aware of any  
3 validation studies have been completed.

4 Q. BY MR. BARRY GOLDSTEIN: Is that true with  
5 respect to proponents evaluation practices as  
6 well?

7 MR. PRINCE: Same objections.

8 THE WITNESS: Yes. I'm not aware of  
9 validation studies being conducted regarding  
10 performance evaluation process.

11 Q. BY MR. BARRY GOLDSTEIN: Would the same be true  
12 with respect to compensation practices?

13 MR. PRINCE: Same objections.

14 THE WITNESS: I'm not aware of validation  
15 studies pursuant to these guidelines being  
16 conducted --

17 Q. BY MR. BARRY GOLDSTEIN: Do you know what a  
18 lease -- Excuse me. Had you finished,  
19 Ms. Matheson?

20 A. Yes. Go ahead.

21 Q. Do you know a Lisa Lewen, L E W E N?

22 A. That name does not -- I recognize the name. I  
23 don't... I don't know more than that.

24 Q. Do you know if she's in the talent practices  
25 department at Nike?

1 A. I'm not sure.

2 Q. Does talent practices report to you?

3 A. Yes. The talent organization reports up to me.

4 Q. We're uploading an exhibit marked as 615. It's  
5 a LinkedIn profile for Lisa Lewen, has her  
6 picture on it. I'm going to ask you whether or  
7 not this profile with her picture refreshes your  
8 recollection about Ms. Lewen. Do you have that  
9 exhibit before you?

10 A. I see. I do. I do.

11 Q. Does this exhibit refresh your recollection  
12 about Ms. Lewen?

13 MR. PRINCE: Vague.

14 THE WITNESS: It does not.

15 Q. BY MR. BARRY GOLDSTEIN: Returning back to  
16 Exhibit 506, which is the uniform guidelines,  
17 and looking on page 18, there is a definition of  
18 job analysis. In section K it reads "A detailed  
19 statement of work behaviors and other  
20 information relevant to the job."

21 A. I see that.

22 Q. Do you know of any job analysis that Nike has  
23 performed with respect to this definition for  
24 any job at Nike World Headquarters in bands L  
25 through S?

1                   MR. PRINCE: Vague, compound, calls for  
2                   expert opinion or legal conclusion.

3                   THE WITNESS: I do not know if any job  
4                   analysis pursuant to this federal standard has  
5                   been conducted for Nike.

6       Q.       BY MR. BARRY GOLDSTEIN: Turning to page 12 in  
7                   section 1607.15.

8       A.       I'm at that section.

9       Q.       And I'll just read it, "Required information.  
10               Users of selection procedures other than those  
11               users complying with Section 15A(1) below,  
12               should maintain and have available for each job  
13               information on adverse impact of the selection  
14               process for that job and, where it is determined  
15               a selection practice has an adverse impact,  
16               evidence of validity as set forth below."

17               Does Nike have available any information on  
18               adverse impact as provided for in this section  
19               with respect to any selection practices used for  
20               jobs in bands L through S at Nike World  
21               Headquarters on female employees?

22               MR. PRINCE: Vague, compound, calls for  
23               expert opinion or legal conclusion.

24               THE WITNESS: I'm going to need you to  
25               repeat that question.

1       you're withholding any information based on  
2       privilege, please let me know whether you are  
3       doing so. Obviously don't reveal that  
4       information that you're withholding because of  
5       privilege, but let me know if you are  
6       withholding any information.

7               THE WITNESS: I am not clear on the question  
8       that you're asking.

9       Q. BY MR. BARRY GOLDSTEIN: Mr. Parker says there's  
10      going to be a comprehensive review of HR  
11      practices. My question is during that  
12      comprehensive review, was there any  
13      investigation of whether or not there were  
14      allegations of misconduct that had been raised  
15      with respect to Mr. Ayre?

16              MR. PRINCE: Same objections here.

17              THE WITNESS: The review of our HR systems  
18      and practices was, I'm not trying to be  
19      difficult, I'm not quite understanding your  
20      question. The HR systems and practices that  
21      were reviewed included systems and practices  
22      that were in place when David Ayre was the CHRO  
23      as well as the systems and practices that were  
24      in place at the time.

25      Q. BY MR. BARRY GOLDSTEIN: Is it fair to say that

1       you don't know of any investigation involved in  
2       this comprehensive review that examined whether  
3       there are allegations of misconduct by [REDACTED]?

4           MR. PRINCE: Same objections here as well as  
5       asked and answered and argumentative. With  
6       respect to the scope of the review, as I've  
7       stated probably three times now, the instruction  
8       is not to answer to the extent that it would  
9       reveal attorney-client privileged  
10       communications.

11           THE WITNESS: If there was a concern  
12       involving [REDACTED], it would have been, it  
13       would have been handed over to our third-party  
14       legal firm Seyfarth, who would have determined  
15       what fact finding and followup should occur.

16    Q.     BY MR. BARRY GOLDSTEIN: Do you know if the  
17       attorneys at Seyfarth Shaw did any investigation  
18       with respect to misconduct by [REDACTED]

19           MR. PRINCE: Same objection, Barry;  
20       privilege.

21           MR. BARRY GOLDSTEIN: Well, if you direct  
22       Ms. Matheson not to answer that question, we'll  
23       move on.

24           MR. PRINCE: That's the instruction.

25           MR. BARRY GOLDSTEIN: Okay. We'll move on.

1 organization.

2 Q. Does that, does that refer to the value bands?

3 A. Yes. The bands are represented in the letters  
4 of the word "value."

5 Q. And --

6 A. Value --

7 Q. Does it also refer to the E7 plus bands?

8 A. Yes. It also includes our vice president  
9 levels.

10 Q. And when you say "vice president levels," the  
11 vice presidents are in the bands E7 to E1; is  
12 that correct?

13 A. Vice presidents are E7 to E1. Yes.

14 Q. Right. And that's what is generally referred to  
15 as E7 plus; right?

16 A. I guess it could be referred to as E7 plus.

17 Q. Okay. Now, within bands there are also levels,  
18 are there not?

19 A. Some bands, some jobs have a band and a job  
20 level, but I don't believe every job has a band  
21 and a job level. I'm not, I'm not familiar with  
22 the full level and banding information for Nike.

23 Q. When you were referring here to banding, were  
24 you also referring to levels within bands?

25 A. For me banding is more the levels of the values

1 A. She did report to me.

2 Q. Did she report to you in 2018?

3 A. She began to report to me in the spring of 2018.

4 Q. Do you know if she was on the team that was to  
5 undertake the time and place and promotion  
6 study?

7 A. I don't recall specifically.

8 Q. Does Julie Fuller report to you?

9 A. Julie Fuller did report to me.

10 Q. Did she report to you in 2018?

11 A. Julie Fuller did report to me in the spring of  
12 2018.

13 Q. Do you know if she was on the team that was to  
14 undertake the time in place and pace of  
15 promotion pay study?

16 A. I don't recall specifically.

17 Q. Do you recall if Ms. Lauren Thibodeaux was on  
18 the team that was to undertake the pace of  
19 promotion and time in place study?

20 A. I don't recall specifically.

21 Q. Isn't it true that the team in the study began  
22 to do its work in June of 2018?

23 A. I don't recall when the work was initiated.

24 Q. Has the work stopped at some point?

25 A. On the advice of counsel we paused the work.

1 Q. Do you recall when it was paused?

2 A. I do not recall when it was paused.

3 Q. You say "pause." That means it may start up  
4 again, in my view. Is that what you mean by  
5 "pause"?

6 A. Yes. I believe we may, we very well may start  
7 this up again at some point in the future.

8 Q. But you haven't started it up again, have you?

9 A. We have not started it up again. No.

10 Q. Do you know if the study was conducted for  
11 several months?

12 A. I'm not aware.

13 Q. Do you know the reason that the study was  
14 stopped on advice of counsel?

15 MR. PRINCE: Objection; privilege, Court's,  
16 also The Court's 2020 order.

17 MR. BARRY GOLDSTEIN: Just asking if she  
18 knows.

19 MR. PRINCE: Objection remains on the basis  
20 of privilege and The Court's October 2020 order.

21 Q. BY MR. BARRY GOLDSTEIN: Was there an answer?

22 A. I'm sorry. What was the question again?

23 Q. Do you know why the study was stopped on advice  
24 of counsel?

25 A. I do not recall why the study was stopped on the



1       advice of counsel.

2       Q.    In your e-mail there is a section "Driving  
3       Toward Change." And there's a bullet point  
4       "Hold Leaders Accountable." What do you mean by  
5       "leaders"?

6       A.    As I mentioned earlier, when we think about  
7       increasing representation, we think about  
8       increasing representation of women and U.S.  
9       people of color. And we do that by looking at  
10      promotions, retention and hiring. And the  
11      leaders who we started with were the top  
12      leadership team, the direct reports to the CEO.

13      Q.    How are leaders held accountable?

14      A.    We provided each leader with visibility to the  
15      diverse representation data for their business  
16      unit and we showed them what the data showed on  
17      promotion, retention and hiring and we worked  
18      with them to use this data to inform talent  
19      plans and strategies designed to increase  
20      representation.

21      Q.    When you say "we," who are you referring to?

22      A.    My team and I provided visibility to the  
23      information and we looked at this information  
24      with Mark Parker.

25      Q.    I'm sorry. I missed, I missed the name.

1           these documents.

2       Q.     Who on the legal team?

3       A.     Our in-house employment counsel.

4       Q.     Can you tell me specifically who?

5       A.     During this period I believe it was a  
6             combination of Lauren Thibodeaux and Rob  
7             Leinwand.

8       Q.     Okay. Let's return to Exhibit 512 under  
9             "Inclusive Hiring." And towards the end of that  
10            bullet point there's a statement, "Remove bias  
11            from critical moments of the hiring process by  
12            creating more inclusive job descriptions,  
13            enabling blind resume reviews, eliminating the  
14            collection of candidate salary history and using  
15            data to inform hiring decisions."

16            Do you see that?

17       A.     I do.

18       Q.     What is meant by "inclusive job descriptions"?

19       A.     Inclusive job descriptions are intended to  
20             remove the types of things that can create  
21             unnecessary or artificial barriers to access to  
22             the jobs.

23       Q.     We're uploading a document that is marked as  
24             Exhibit 510. It's a job description for  
25             professional entry and the job code is A0054.

1 This is just an example of a Nike job  
2 description. Is this what you mean by "job  
3 description"?

4 A. I don't recognize this document.

5 Q. What are you referring to as a "job description"  
6 in this sentence?

7 A. Our Talent Acquisition team, when they are  
8 posting roles, whether it's internally, for  
9 internal or external candidates, they use a job  
10 description that we explicitly edit to remove  
11 anything that might create an artificial barrier  
12 to applicants who are otherwise qualified to the  
13 role.

14 Q. Who would be responsible in talent acquisitions  
15 for carrying out the goal of creating more  
16 inclusive job descriptions?

17 A. I don't know. I don't know who's responsible  
18 for that specific task.

19 Q. And talent acquisitions does report to you, does  
20 it not?

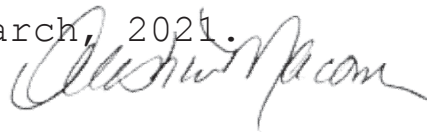
21 A. Talent acquisitions does report to me.

22 Q. We're uploading two documents, Exhibit 552 and  
23 555. Exhibit 552 is a e-mail dated July 23rd,  
24 2018, subject, "Upcoming Pay and Reward Changes"  
25 from yourself to Nike employees.

## C E R T I F I C A T E

I, Aleshia K. Macom, Oregon CSR No. 94-0296, Washington CCR No. 2095, California CSR No. 7955, RMR, CRR, RPR, do hereby certify that MONIQUE MATHESON appeared before me remotely at the time and place mentioned in the caption herein; that the witness was by me first duly sworn on oath, and examined upon oral interrogatories propounded by counsel; that said examination, together with the testimony of said witness, was taken down by me in stenotype and thereafter reduced to typewriting; and that the foregoing transcript, pages 1 to 213, both inclusive, constitutes a full, true and accurate record of said examination of and testimony given by said witness, and of all other proceedings had during the taking of said deposition, and of the whole thereof, to the best of my ability.

Witness my hand at Portland, Oregon, this  
3rd day of March, 2021.



Aleshia K. Macom

OR CSR No. 94-0296, Expires 9-30-2023

WA CCR No. 2095, Expires 7-7-2021